

Exhibit 4

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

* * * * *
STEPHEN BECKMAN, *
Plaintiff *
VS. * CIVIL ACTION
* NO. 03-cv-12567
BULL HN INFORMATION SYSTEM, INC., *
Defendant *
* * * * *

DEPOSITION OF STEPHEN BECKMAN, called by the
Defendant, pursuant to Rules 26 and 30 of the Federal
Rules of Civil Procedure, before Ruth E. Hulke, Certified
Shorthand Reporter No. 114893 and Notary Public for the
Commonwealth of Massachusetts, at Wilmer, Cutler,
Pickering, Hale and Dorr, LLP, 60 State Street, Boston,
Massachusetts, on Thursday, December 16, 2004, commencing
at 12:00 p.m.

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Hearings ♦ Conferences ♦ Legal Proceedings

1 familiar with?

2 A. I think the one in '92 I was familiar with.

3 Q. Which facility or facilities were affected?

4 A. I'm trying to think. I can't remember. There
5 was nine facilities, somewhere around there, off and on,
6 and I just can't remember the dates when each one was
7 there and not there or sold or merged or whatever.

8 Q. Were the manufacturing facilities experiencing
9 layoffs in the 1990s?

10 A. Yes.

11 Q. Were the finance groups within the
12 manufacturing facilities experiencing layoffs?

13 A. No.

14 Q. What was the first occasion on which a finance
15 group in a manufacturing facility experienced a layoff?

16 A. I can't -- There were too many different
17 groups. I wouldn't remember.

18 Q. Were you familiar with a publication called
19 Bull By The Week?

20 A. At this point in time, no.

21 Q. Do you remember if there was a weekly
22 newsletter that was sent out at Bull?

23 A. There again, I can't recall at this point in

1 time.

2 (Document marked Exhibit No. 3 for Id.)

3 Q. If you would take a look at Exhibit 3, please.
4 Would you tell us whether or not that refreshes your
5 memory if you remember receiving a publication called
6 Bull By The Week?

7 A. I just don't remember it. Really don't.

8 Q. Do you recall -- I'm sorry. Go ahead.

9 A. I just don't remember, you know, this report.

10 Q. Whether you remember this particular edition --

11 A. Not the edition. I mean just the weekly
12 report, if you want to call it.

13 Q. Do you remember whether you received any
14 publication while you were at Bull?

15 A. I'm sure I did.

16 Q. Do you recall being aware during the period
17 that you were at Lawrence on the basis of such a
18 publication that layoffs were occurring at Bull?

19 MS. EDGREN: Objection.

20 A. I heard of them.

21 Q. What did you understand to be Bull's financial
22 or economic status by the 1993/1994 time frame?

23 A. I wasn't really paying much attention to the,

1 you know, the overall company. I was more interested in
2 getting my own, you know, niche fixed, what I was doing,
3 and we were basically in the factory. So you don't see
4 the overall picture up in Lawrence. Billerica, you could
5 see more, that was the finance center. But in Lawrence
6 you just saw the small factory portion. You didn't see
7 the overall picture.

8 Q. Let me focus you more particularly on 1994.
9 Over the course of your last year at Bull is it your
10 testimony that you had no awareness of financial issues
11 or concerns with the company?

12 MS. EDGREN: Objection.

13 A. I wasn't in the position that I could see the
14 finance numbers at that point in time. I wasn't privy to
15 them. I was just, you know, a worker doing my job.

16 Q. Did you have any understanding as to the extent
17 to which the Bull workforce in the United States had
18 shrunk?

19 A. No.

20 Q. Do you recall in the year 2004 that the GCOS 6
21 line began the process of being phased out?

22 A. I can't remember at this time.

23 Q. Do you remember that GCOS 6 was phased out or

1 item?

2 Q. Was Bull involved in contract manufacturing at
3 the Lawrence facility by the time of your departure?

4 A. I can't remember.

5 Q. Do you know whether in the 1993/1994 time frame
6 Bull's manufacturing of its own product, the proprietary
7 product, was being ratcheted down?

8 MS. EDGREN: Objection.

9 A. I just answered that. I still saw the product
10 line out on the floor. What the volume was I wasn't
11 privy to.

12 Q. Is it your testimony, sir, as you sit here
13 today that you had no awareness in your last two years at
14 Bull that Bull was phasing out of producing its own
15 proprietary product and doing contract manufacturing for
16 others?

17 MS. EDGREN: Objection.

18 A. Yes.

19 Q. You knew nothing about that?

20 A. No.

21 Q. Were you aware of Bull performing contract
22 manufacturing for others at all at Lawrence?

23 A. No. Printed circuit boards in Brighton.

1 A. Right. You could see the manufacturing area.
2 Or a piece of the manufacturing area. It was
3 seven stories.

4 Q. Given that you were part of finance, were you
5 concerned at all with cost reduction issues?

6 A. Yes.

7 Q. Do you recall what, if any, efforts were under
8 way with regard to cost reduction at Bull in 1994?

9 A. No. That was, that was the manufacturing VP's
10 responsibility. The only thing I could see was whether
11 they were buying the product parts at a reasonable price.

12 Q. Did you make any observations as to the
13 quantity of the product being purchased for use at the
14 Lawrence facility?

15 A. The only time I would have seen what was being,
16 what they had on hand was when we took the physical.

17 Q. Do you have any recollection that the amount of
18 product being purchased was declining in 1994?

19 A. No.

20 MS. EDGREN: Objection.

21 Q. Do you have any awareness of whether Bull was
22 attempting to reduce the manufacturing capacity in order
23 to meet a declining demand?

1 MS. EDGREN: Objection.

2 A. No.

3 Q. Was the volume of what was being manufactured
4 at Lawrence declining?

5 A. Lawrence was the final product. That's where
6 everything went out the door. It was hard to say. Some
7 months were up, some months were down.

8 Q. Was the overall amount of product being
9 manufactured at Lawrence declining from 1993 into 1994?

10 A. I was out of Billerica at that time, so,
11 therefore, I didn't see the reports that produced those
12 numbers.

13 Q. Were the shipments going down?

14 A. I didn't keep track of the shipment. All I had
15 to do was worry about whether I costed it correctly or
16 not. So I was just concerned with each individual
17 shipment. I did not keep score on how many they were
18 putting out the door.

19 Q. Did you have any awareness of the percentage by
20 which the amount of product being produced was going
21 down?

22 (Telephone interruption)

23 (Brief recess)

1 Q. Did you become aware at any point before you
2 actually departed that the Lawrence plant was scheduled
3 to be shut down?

4 A. No.

5 Q. Did you become aware that the Brighton plant
6 was scheduled to be shut down?

7 A. No.

8 Q. Were you aware of any particular manufacturing
9 facility that was scheduled to be shut down?

10 A. In what time frame are we talking?

11 Q. 1993/1994.

12 A. No.

13 Q. Were there any layoffs at Lawrence in 1993 or
14 1994 up to the time that you received your notice?

15 A. Yes.

16 Q. How many?

17 A. I have no idea.

18 Q. Do you recall when the layoff or layoffs were?

19 A. No. I know they were. And I don't know what
20 groups were associated with it. I just remember there
21 were layoffs.

22 Q. At Lawrence?

23 A. Yes.